

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RANK GROUP LIMITED.

12 Civ. 3769 (GBD)

Plaintiff,

ECF Case

-against-

[JOINT PROPOSED] AMENDED CIVIL CASE MANAGEMENT PLAN AND

SCHEDULING ORDER

ALCOA INC.,

Defendant.

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Upon agreement of the parties, the following Amended Case Management Plan and Scheduling Order is adopted.

I. Pre-Trial Deadlines!

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Defendant's Answer date	September 7, 2012
Rule 26(a) Disclosures	September 14, 2012
Submission to District Court of Requests to Issue Letters Rogatory	September 28, 2012
Joinder of Additional Parties	October 8, 2012
Amendment of Pleadings	October 8, 2012
Document Requests and Interrogatories ²	October 22, 2012
Written Responses and Objections to Document Requests and Interrogatories	November 29, 2012

The parties reserve the right to seek reasonable and necessary extensions of these deadlines to the extent factors outside of their control interfere with the timely completion of discovery.

The parties reserve the right to serve supplemental requests no later than 30 days prior to close of fact discovery based on information learned during discovery.

Initial Production of Documents	December 21, 2012
Last day for depositions of all fact witnesses and close of fact discovery	September 13, 2013
Designation of Experts, if any	September 13, 2013
Initial Expert Reports	September 27, 2013
Rebuttal Reports	October 18, 2013
Last day for expert depositions and close of expert discovery	November 8, 2013
Dispositive Motions, if any	December 6, 2013
Responses to Dispositive Motions, if any	January 10, 2014
Replies to Dispositive Motions, if any	January 31, 2014
Joint Pretrial Order	January 10, 2014 (or 3 weeks after decision on dispositive motions, if filed)
Final Pretrial Conference	January 17, 2014 (or 4 weeks after decision on dispositive motions, if filed)
Ready for Trial Date	March 3, 2014 (or 4 weeks after final pretrial conference, if dispositive motions)

II. Governing Rules and Trial

- All motions and applications shall be governed by the Court's Individual Rules of Practice.
- 2. The parties estimate that trial will take no longer than one week, and this will be a non-jury trial.

Dated: August 1, 2013

New York, New York

SO ORDERED:

AUG 06 2013

George B. Deniels United States District Judge

Gary W. Kubek Attorney for Plaintiff

Attorney for Defendant